



February 27, 2012

Michelle Kerr  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 5  
Superfund Division (SR-6J)  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

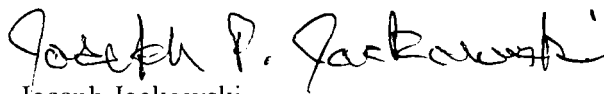
Re: Information Request for the Chemetco Superfund Site in Hartford, Illinois

Dear Ms. Kerr:

Enclosed you will find Weyerhaeuser NR Company's response to the above-referenced Information Request.

As set forth in our response to Request Number 2 contained in the enclosed Response to Information Request, there is only one nexus document purportedly connecting Weyerhaeuser NR Company to the Chemetco Site. This nexus document was provided to us by the USEPA. We have been unable to authenticate the document despite a review of our records, those of International Paper Company, the present owner of the ostensible generating facility, and those of Waste Management, the ostensible transporter. Waste Management has further advised us that the account number on the document does not correspond with Weyerhaeuser. Further, the document lacks a date, quantity of materials or a description of materials. From this document we are unable to determine whether Weyerhaeuser sent hazardous substances to Chemetco. At this point in time we are not inclined to participate in future negotiations regarding the site.

WEYERHAEUSER NR COMPANY

  
Joseph Jackowski  
Senior Legal Counsel

Enclosures

**February 27, 2012**

Michelle Kerr  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 5  
Superfund Division (SR-6J)  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

Re: Response to Request for Information Pursuant to Section 104 of CERCLA for the  
Chemetco Superfund Site in Hartford, Illinois

**1. a. State the complete legal name of your company.**

Weyerhaeuser NR Company

**1. b. State the name(s) and address(es) of the President and the Chairman of the Board, or other presiding officer of the company.**

Dan S. Fulton, President & CEO  
33663 Weyerhaeuser Way South  
Federal Way, WA 98003

**1. c. State the state of incorporation of the company and the company's agents for service.**

The state of incorporation of the company is Washington and the company's agent for service is National Registered Agents, Inc., 1780 Barnes Blvd SW, Bldg. G, Tumwater, WA 98512-0410.

**1. d. State the name(s) of all subsidiaries, affiliates, or parent companies to your company.**

Weyerhaeuser Company is the parent company of Weyerhaeuser NR Company.

The following are subsidiaries of Weyerhaeuser NR Company:

Jasmine Forests, LLC  
Jewel Forests, LLC  
Liaison Technologies, Inc.  
Monte Cristo Partners, LP  
National Equity Fund 1992 Limited Partnership  
National Equity Fund 1993 Limited Partnership  
New Home Technologies, L.L.C.  
North Pacific Paper Corporation  
Norpac Resources LLC  
ver Bes' Insurance Company  
WFS II LLC  
Weyerhaeuser Asset Management LLC  
Weyerhaeuser Biofuels LLC  
Weyerhaeuser Employment Services Company  
Weyerhaeuser EU Holdings, Inc.  
Weyerhaeuser Global Finance Company  
Weyerhaeuser International, Inc.  
Weyerhaeuser Real Estate Company  
Weyerhaeuser Real Estate Development Company  
Weyerhaeuser SC Company  
WY Carolina Holdings, LLC  
WY Georgia Holdings 2004 LLC  
WY Tennessee Holdings, LLC  
Weyerhaeuser Solutions, Inc.

1. **e. The state of incorporation and agents for service of process in the state of incorporation.**

See response to Request Number 1.c.

1. **f. The status of all subsidiaries, affiliates, or parent companies to your company.**

All subsidiaries and the parent company are active companies.

2. **Describe and provide any documents related to your company's business activities which resulted in sending materials to Chemetco.**

Attached as Exhibit 1 is a Waste Management of Metro East invoice no. 032756 wherein Weyerhaeuser Paper Company in Belleville, Illinois is listed as the customer. This document was provided to Weyerhaeuser by EPA as a nexus document. Weyerhaeuser has been unable to find any document, including the nexus document, in its records relating to Chemetco.

Weyerhaeuser sold the Belleville, IL facility to International Paper Company on August 4, 2008. Included with the sale were the business records. We consequently made inquiries to International Paper Company. Jim Schuhardt, Environmental Coordinator, and Gary Schwoebel, Site Manager for International Paper in Belleville were unable to locate any document, including the nexus document, relating to Chemetco.

Weyerhaeuser and International Paper each also contacted Waste Management and inquired as to the nexus document and any other documents that may connect Weyerhaeuser or the Belleville facility to Chemetco. Waste Management could not locate the nexus document or any other document connecting Weyerhaeuser or its former Belleville facility to Chemetco. Further, according to Waste Management, the account number on the nexus document is not associated with Weyerhaeuser Paper Company, the purported customer on the document.

Consequently, we have only one document purportedly connecting Weyerhaeuser to the Chemetco Site. This nexus document provided to us by EPA lacks a date, a quantity of materials, or a description of materials. From this document we are unable to determine whether hazardous substances were sent to Chemetco.

- 3. Describe and provide any documents related to your company's role at the Site, including what duties/involvement your company had at the Site.**

See response to Request Number 2.

- 4. If the nature or size of Respondent's activities in relation to Chemetco changed over time, describe those changes and the dates they occurred.**

We have not located any information to answer this question.

- 5. For each type of waste or material used in Respondent's operations, describe and provide documents relating to Respondent's contracts, agreements, or other arrangements for its disposal, treatment, trading, or recycling with Chemetco, including but not limited to whether Respondent controlled where waste sent to Chemetco warehouses was ultimately processed/recycled.**

We have not located any information to answer this question. See response to Request Number 2.

- 6. If not already provided, specify the dates and circumstances when Respondent's waste or material was taken to the Site, and identify the companies or individuals who brought Respondent's waste/material to the Site. Provide any documents which support or memorialize your response.**

See response to Request Number 2.

7. **Were transactions between your company and Chemetco and specifically the Site: 1) an outright sale; 2) subject to a written or verbal “tolling” agreement between the companies; or 3) reflected the “banking” of the transacted material in a metal account at the request of your company for return or other disposition at a late date?**

We have not located any information to answer this question. See response to Request Number 2.

8. **Did your company have any influence over waste disposal or recycling activities at the Site? If so, how?**

We have not located any information to answer this question.

9. **Was any shipment of material sent to the Site by Respondent ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.**

We have not located any information to answer this question.

10. **Describe in detail the types of material that you sent for recycling, processing, or disposal at the Site. In your response, please also give the generic name of each type of materials shipped to the Site [e.g. scrap metal (including scrap automobiles), batteries, electronics, scrap paper, scrap plastic or scrap textile, etc.]**

See response to Request Number 2.

- a. **Identify whether the materials were delivered directly to the Site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.**

We have not located any information to answer this question.

- b. **State whether any of the material was ever tested by your company and if so, whether the substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. §261, Subpart C.**

We have not located any information to answer this question.

- c. **Describe what was done to materials once they were brought to the Site, including any further processing of the materials.**

We have not located any information to answer this question.

**d. Provide any additional information and all documents that you believe are related to the type, nature and characteristics of the materials you sent to the Site.**

See response to Request Number 2.

**e. List the years in which your company sent materials to Chemetco and/or its broker(s) for recycling, processing, or disposal.**

We have not located any information to answer this question. See response to Request Number 2.

**11. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:**

See response to Request Number 2.

**a. Did a market exist for the scrap metal listed in your response to No. 10 above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of the commercial specification grade (e.g. Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).**

We have not located any information to answer this question.

**b. What commercial specification grade did the scrap metal listed in your response to question No. 10 meet? Identify/list the commercial specification grades that each scrap metal identified in No. 9 met.**

We have not located any information to answer this question.

**c. At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question No. 10? Did this include burning as fuel, or for energy recovery, or incineration?**

We have not located any information to answer this question.

**d. After sale, transfer, delivery, recycling, or disposal, what portion of the scrap metal listed in your response to question No. 10 was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.**

We have not located any information to answer this question.

**e. Could the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a virgin raw material? If so, provide details.**

We have not located any information to answer this question.

**f. Could any products made from the scrap metal listed in your response to question No. 10 have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.**

We have not located any information to answer this question.

**g. Did your company melt the scrap metal listed in your response to question No. 10 before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal.**

We have not located any information to answer this question.

**h. Describe the source of or the process that produced the materials sent to the Site.**

We have not located any information to answer this question.

**12. Did any of the scrap material sent to the Site contain other material(s) incident to or adhering to the scrap? If so, describe in detail.**

We have not located any information to answer this question. See response to Request Number 2.

**13. Did any of the material sent to the Site contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at the Site, after being received at the Site, or was the wire not stripped?**

We have not located any information to answer this question. See response to Request Number 2.

**14. Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.**

We have not located any information to answer this question. See response to Request Number 2.

- 15. Describe all efforts (i.e. Site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question No. 10.**

We have not located any information to answer this question.

- 16. For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers, monitors, cables, circuit boards, or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:**

See response to Request Number 2.

- a. List an estimated number of shipments of electrical and electronic equipment your company sent to the Site on an annual basis and list the years. In this list, include the type and quantity, volume and weight of electrical and electronic equipment sent;**

We have not located any information to answer this question.

- b. At the time of the transaction (s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 15((a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?**

We have not located any information to answer this question.

- 17. With respect to waste or materials sent to the Site, at the time of the transactions, specify the measures you took to determine the actual means of treatment, disposal, recycling, or other uses of the material. Provide information you had and any documents relating to the treatment, recycling and disposal practices of Chemetco at the Site. What assurances, if any, were you given by the owner/operator of the Site regarding the proper handling and ultimate disposition of the materials you sent there, as well as its compliance with applicable environmental laws? Include in your response any correspondence to and from Chemetco relating to this topic and dates the measures were taken or assurances were given.**

We have not located any information to answer this question.

- 18. What efforts and when, if any, did you take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering disposing of, trading, or arranging for the treatment, recycling, or disposal of any materials?**



We have not located any information to answer this question.

- 19. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. §9627, sent to the Chemetco Site.**

We have not located any information to answer this question.

- 20. Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding scrap metal promulgated under Resource Conservation and Recovery Act (RCRA).**

We have not located any information to answer this question.

- 21. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.**

USEPA ID# ILD006310619

- 22. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Contract Act, 15 U.S. C. Sections 2601 et se., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S. C. Section 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. Section 1251 et seq.**

- a. Emergency Planning and Community Right-to-Know Act (EPCRA) report out annually to the Illinois Emergency Management Agency for Tier 2 reporting purposes.
- b. Illinois Environmental Protection Agency/National Pollutant Discharge Elimination System (NPDES) Permit.

- 23. Identify the federal and state offices to which such information was sent. State the years during which such information was sent/filed.**

- a. Illinois Emergency Management Agency – Springfield, Illinois (1996 to Present)
- b. Illinois Environmental Protection Agency/Water Pollution Control – Springfield, Illinois (1996 to Present)

- 24. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the**

**additional information or documents that they may have.**

As stated in responses 2, 25, and 26 we consulted with Waste Management, Inc. and International Paper Company whom we believed could have additional responsive documents and/or information. The information we received from those companies is included in our responses herein. With the exception of the individuals listed in response 25(d), we are not aware of any other source of information.

- 25. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. For each and every question contained herein, if information or documents response to this Information Request are not in your possession, custody or control, then identify the persons from which such information or documents may be obtained. If the records were destroyed, provide us with the following:**

We are not aware that any responsive records are no longer available.

**a. the document retention policy between 1970 and 2001;**

The nexus document provided by EPA is titled "service ticket agreement/non-hazardous". Based on the title of this document the Respondent's records retention policy relating to accounting records and environmental records would apply. Accounting records are retained through the open tax audit year which currently is 2000. The non-hazardous (solid waste) records are retained for 5 years.

The Belleville, IL facility was sold to International Paper Company on August 4, 2008. Any records relating to the Belleville, IL facility were transferred to International Paper Company at the time of the sale. Gary Schwoebel, Site Manager at the Belleville, IL facility confirmed that records at the facility have not been destroyed since 1996.

**b. a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction;**

We have not located any information to answer this question.

**c. a description of the type of information that would have been contained in the documents;**

We have not located any information to answer this question.

**d. the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these**

**documents; and the person(s) who had and/or still may have the originals or copies of these documents; and**

William Foshee, Production Manager (former), address unknown  
Steve Hundsorfer, Production Manager (former), address unknown  
Roger Maxson, Production Manager (former), address unknown

**e. the names and most current address of any person(s) who may possess documents relevant to this inquiry.**

We have not located any information to answer this question.

**26. Please state the name, title and address of each individual who assisted or was consulted in the preparation of the response to this information request.**

Joseph P. Jackowski  
Senior Legal Counsel  
Weyerhaeuser NR Company  
Law Department  
33663 Weyerhaeuser Way South  
Federal way, WA 98003  
Mr. Jackowski assisted in the preparation of all responses.

Jacqui Hawn  
Paralegal  
Weyerhaeuser NR Company  
Law Department  
33663 Weyerhaeuser Way South  
Federal way, WA 98003  
Ms. Hawn assisted in the preparation of all responses.

Jim Schuhardt, Environmental Coordinator, International Paper Company, 3001 Otto Street, Belleville, Illinois 62226.  
Mr. Schuhardt was consulted and assisted in the preparation of responses 2 through 25.

Gary Schwoebel, Site Manager, International Paper Company, 3001 Otto Street, Belleville, Illinois 62226.  
Mr. Schwoebel was consulted and assisted in the preparation of responses 2 through 25.

Becky Lelingus, Paralegal, Waste Management, Midwest Group, 720 East Butterfield Road, Lombard, Illinois 60148.  
Ms. Lelingus was consulted in the preparation of response number 2.

I certify under penalty of law that this document and all enclosures were prepared under my director or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Joseph Jackowski  
Senior Legal Counsel

Joseph P. Jackowski

Sworn to before me this 27 day of February, 2012



Jacqueline W. Han  
Notary Public in and for the State of  
Washington, residing at: Federal Way

My Commission Expires: 2/28/16

## EXHIBIT 1



Waste Management of Metro East

P. O. Box 148

Madison, IL 62060

TEL: 615/452-0148 or 800/ 642-4814

FAX: 615/452-0162

032753

**SERVICE TICKET AGREEMENT/NON-HAZARDOUS WASTES**

DIVISION NUMBER	110200	ACCOUNT NUMBER	0294925	SERVICE TYPE	RI
CUSTOMER	WEYERHAUSER PAPER COMPANY				
ADDRESS	3001 OTTO STREET				
CITY	BELLEVILLE 62223				

ORDER NUMBER		SERVICE DATE	
TIME IN		TIME OUT	
125			
ROUTE ID	DISPOSAL ID	DISPOSAL TICKET	
SIGNATURE		COD AMOUNT	

ACTION	ORD QTY	SERVICE DESCRIPTION	WASTE TYPE	BILL CODE	MEASURE	BILL QUANTITY	AMOUNT
1R	1	20RLW 20 YARD CONTAINER WM		200	11		

COMMENTS

TAKE TO CHEMETCO TO DUMP

SERVICES ACCEPTED SUBJECT TO THE TERMS AND CONDITIONS ON THE REVERSE SIDE AND PAYMENT AGREED TO BE MADE IN ACCORDANCE WITH THE CONTRACTOR'S CURRENT RATE SCHEDULE

CUSTOMER  
SIGNATURE

CONTRACTOR  
SIGNATURE

QMS-0038T 10 901

WHITE — OFFICE

YELLOW — CUSTOMER

PINK — CONTROL